

**UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE AT MEMPHIS**

ALLISON HAMES,

Plaintiff,

VS.

**No. 2:18-cv-02121-SHM-cgc
JURY DEMANDED**

**SUNTRUST BANK,
CITIBANK, N.A., and
JEFFREY CRANFORD,**

Defendants.

PLAINTIFF'S SECOND MOTION TO LIFT STAY ON PROCEEDINGS

COMES NOW the Plaintiff, Allison Hames, by and through her legal counsel of record, Kevin A. Snider of Snider & Horner, PLLC, and hereby moves this Court to lift the stay on these proceedings. As grounds the Plaintiff would state and show as follows:

On June 11, 2018, the parties filed a Joint Motion to Stay Proceedings for 120 days (Doc. 26).

On June 11, 2018, this Court granted said Joint Motion to stay these proceedings 120 days.

On November 12, 2019, the Plaintiff filed a Motion to Lift Stay (Doc. 43) which was subsequently denied by this Court essentially because the criminal proceedings were still pending against Defendant, Jeffrey Cranford (Doc. 51).

Thereafter, Defendant Jeffrey Cranford plead guilty in the criminal proceedings and was sentenced on September 29, 2022 which fully concluded the criminal matter (See Case No. 2:18-cv-20103). As such, the Plaintiff would aver that this matter is now in a posture to proceed forward.

Prior to filing this Motion, the Plaintiff's counsel attempted to resolve the issues in this Motion with opposing counsel via written correspondence dated November 10, 2022 and has not received any type of response.

WHEREFORE PREMSIES CONSIDERED, the Plaintiff prays that this Court enter an Order lifting the stay, reset the scheduling conference in this matter, require the two corporate Defendants to file a responsive pleading to the Complaint within twenty-one (21) days from the date of entry of the Order lifting the stay, and for any other relief that is just and proper.

Respectfully submitted,

SNIDER & HORNER, PLLC

By: /s/ Kevin A. Snider
Kevin A. Snider (BPR # 18231)
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CERTIFICATE OF SERVICE

I, Kevin A. Snider, hereby certify that the foregoing document has been properly filed with the Clerk of Court and properly served upon the parties of record via the Court's ECF system and via U.S. Mail to Defendant, Jeffrey Cranford, at 1401 Albert Drive, Modesto, CA 95355 this the 12th day of January 2023.

By: /s/ KEVIN A. SNIDER